

EXHIBIT 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 23-cr-269 JSW-1
Plaintiff,)	DECLARATION OF JOSEPH VIGIL
v.)	
MORTEZA AMIRI,)	
Defendant.)	

I, JOSEPH VIGIL, declare as follows:

1. I am Acting Chief of the Antioch Police Department.

2. Morteza Amiri was placed on administrative leave from the Antioch Police Department following the execution of a federal search warrant concerning him in March 2022. However, he was permitted to retain his K-9 "Purcy" at the time. The K-9 remained the property of the Antioch Police Department.

3. In May 2023,, the Antioch Police Department made the decision to take possession of K-9 Purcy from Mr. Amiri. On May 2, 2023 the Antioch Police Department took possession of the K-9

1 from Mr. Amiri.

2 4. A few days after the Antioch Police Department took possession of the K-9, Mr. Amiri
3 called me repeatedly while I was at work. When I answered, Mr. Amiri repeatedly demanded answers
4 about where the dog was and why it was taken from him, stating he was entitled to answers, among
5 other things.

6 5. I was subsequently told that Mr. Amiri was outside, in the parking lot of the Antioch
7 Police Department, even though he was on administrative leave and not permitted to be on the premises
8 without authorization. I spoke with Mr. Amiri on the phone, instructed him to go home, and ended the
9 phone call. Mr. Amiri continued to call me repeatedly.

10 6. I requested that other officers from the Antioch Police Department call Mr. Amiri to calm
11 him down. The officers spoke with him, and then told me that I should not leave the building because
12 Mr. Amiri was possibly armed and may hurt me. They advised me he was not thinking rationally and
13 was extremely agitated.

14 7. I was concerned for my own safety and the safety of others at the Antioch Police
15 Department while Mr. Amiri was on the premises.

16 8. Mr. Amiri subsequently left the premises without any further confrontation.
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18 I declare under penalty of perjury under the laws of the United States that the foregoing is true
19 and accurate to the best of my knowledge. Executed this 14th day of March, in Antioch, California.
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21 /s/ Joseph Vigil
22 JOSEPH VIGIL
23 Acting Chief, Antioch Police Department
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EXHIBIT 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 23-cr-269 JSW-1
Plaintiff,)	DECLARATION OF JESSICA DUSTON
v.)	
MORTEZA AMIRI,)	
Defendant.)	

I, JESSICA DUSTON, declare as follows:

1. I am a Special Agent with the Federal Bureau of Investigation

2. On August 14, 2023, I conducted surveillance in the vicinity of Morteza Amiri's residence prior to the execution of an arrest warrant for him. I was in an unmarked vehicle. Another FBI Special Agent was also conducting surveillance in an unmarked vehicle on the opposite side of the street.

3. As part of my preparation for the surveillance, I was advised that Morteza Amiri owned a number of firearms and had previously followed agents during surveillance. I also learned the make,

1 model, color, and license plate number of Morteza Amiri's vehicle.

2 4. While I was present surveilling the area, Morteza Amiri's vehicle drove out of his dead-
3 end street at a high rate of speed and then stopped abruptly next to the driver's side of my car for
4 approximately five seconds, indicating he was aware of my presence.

5 5. Based on the aggressive nature of his approach to my vehicle, I feared a confrontation. I
6 was concerned that he might open fire because I knew he was a former police officer who owned
7 multiple firearms, and because I could not see into his car due to the heavily tinted windows.

8 6. The driver then continued at a high rate of speed, made an abrupt U-turn, and sped over
9 to my partner's vehicle, stopping abruptly inches away from her for approximately 3-5 seconds in a
10 similarly aggressive fashion.

11 7. The car then drove away.
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13 I declare under penalty of perjury under the laws of the United States that the foregoing is true
14 and accurate to the best of my knowledge. Executed this 17th day of March, in San Diego, California.
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16 /s/ Jessica Duston
17 JESSICA DUSTON
18 Special Agent, Federal Bureau of Investigation
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EXHIBIT 3

[EXTERNAL EMAIL] - Fw: Injured Worker On-site Today 8/25/23 - Morteza Amiri, City of Antioch

From: [REDACTED]@mpa-nc.com>
To: "Zoback, Thuy T. (SF) (FBI)" <[REDACTED]>
Date: Mon, 10 Feb 2025 16:18:37 -0800

From: [REDACTED]@mpa-nc.com>
Sent: Friday, August 25, 2023 1:04 PM
To: [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>
Cc: Staff [REDACTED]@mpa-nc.com>
Subject: RE: Injured Worker On-site Today 8/25/23 - Morteza Amiri, City of Antioch
Importance: High

UPDATE:

Walnut Creek PD has made their rounds at the office and were unable to locate Mr. Amiri. They checked in with business across the parking lot and there were no witnesses to seeing him anywhere nearby. There were paramedics parked nearby who also indicated they had not seen him.

WC PD cleared the area, and indicated they were more than happy to help us out. They are aware of the situation involving Antioch PD and wanted me to remind everyone to call them whenever there is a need. They know the nature of our business and understand the issues surrounding claims.

I have asked both [REDACTED] and [REDACTED] to leave together today to be able to escort each other out in the chance he should return.

Thanks for your diligence and assistance in keeping our employees safe.

[REDACTED]

From: [REDACTED]@mpa-nc.com>
Sent: Friday, August 25, 2023 12:14 PM
To: [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>
Cc: Staff [REDACTED]@mpa-nc.com>
Subject: RE: Injured Worker On-site Today 8/25/23 - Morteza Amiri, City of Antioch

His Workers' Comp claim has been denied, and because of the charges against him, the City is not paying him, he does not have benefits, and [REDACTED]. He is desperate and unstable.

I have called the Walnut Creek PD and they are sending someone over to take a look at the premises.

Amiri is represented by an attorney for his WC Claim so he has no business being on our premises.

Thanks everyone

From: [REDACTED]
Sent: Friday, August 25, 2023 12:01 PM
To: [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>; [REDACTED]@mpa-nc.com>
Cc: Staff [REDACTED]@mpa-nc.com>
Subject: Injured Worker On-site Today 8/25/23 - Morteza Amiri, City of Antioch
Importance: High

Good morning,

This is an alert – PLEASE EXERCISE CAUTION

Please be advised that one of the police officers facing charges who works for the City of Antioch, who also has an active workers' compensation claim, is on-site at the office right now. His name is Morteza Amiri and his photo is attached.

He has shown up to the office in the past to drop off paperwork, but left everyone feeling uneasy. He appears to be unstable, and given we are not paying benefits, and he is facing these charges, it would be safe to assume he is not in a stable state of mind.

I have advised [REDACTED] not to open the door. She is there by herself as [REDACTED] is on vacation today.

[REDACTED] should not open the door either. I am not aware of anyone else in the office today, but please call your folks if there are.

He is apparently peeking into the windows trying to see if someone is in the office.

If he does not leave any time soon, we will notify police.

Thank you,

[REDACTED]



Play Safe-Live Safe-Work Safe

Keep the workplace safe by following these precautions:

- * Stay home if you are sick or experiencing [COVID-19-like symptoms](#)
- * Consider getting vaccinated. It's free! myturn.ca.gov/
- * Wash hands frequently ([watch video](#))

CAUTION

Remember your security awareness training: Stop, think, and use caution before clicking links/attachments.

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EXHIBIT 4

- 1 of 2 -

FD-302 (Rev. 5-8-10)

UNCLASSIFIED//FOUO
FEDERAL BUREAU OF INVESTIGATIONDate of entry 02/14/2025

On February 7, 2025, FBI Special Agents (SA) Thuy Zoback and Armando Delgado-Campos traveled to the Municipal Pooling Authority (MPA), 1911 San Miguel Drive, Walnut Creek, CA. Agents spoke to a woman working at the front desk, who did not provide her name and informed agents she was brand new. She called her manager [REDACTED], at phone number [REDACTED]. [REDACTED] spoke to agents on speaker phone and said the following:

[REDACTED] knew of Morteza Amiri, who had several workers comp claims with the city of Antioch. In August 2023, Amiri came to the MPA Walnut Creek office and his behavior resulted in the Walnut Creek Police being called out. [REDACTED] believed an employee named [REDACTED] was alone in the office at the time of the incident. [REDACTED] recalled sending an email out to her staff regarding the incident and warning them of Amiri. [REDACTED] said she would ask [REDACTED] to call agents the following week.

On February 10, 2025, SA Zoback and SA Krystal Martinelli received a phone call from [REDACTED] at phone number [REDACTED]. [REDACTED] worked at MPA in Walnut Creek and was at work on August 25, 2023. A few weeks prior to August 25, 2023, [REDACTED] had a talk with [REDACTED] and other co-workers regarding Morteza Amiri. [REDACTED] told them that Amiri had come by the office with a few questions regarding his "psych" claim. An MPA employee named [REDACTED] told Amiri to finish certain forms and then mail the forms to MPA. Amiri's claim was denied, and [REDACTED] told her employees not to let Amiri in if he came back to the office.

On August 25, 2023, [REDACTED] was in the office by herself, when Amiri came to the front door of the office. Amiri saw her through the office window, and he started banging on the door. [REDACTED] did not let him in. Amiri lingered around the office, pacing back and forth in front of the office windows. He couldn't get in, as the front door was locked. Amiri got louder and louder. [REDACTED] called the Walnut Creek Police because he wouldn't leave. By the time the police came, Amiri left. Walnut Creek Police told them to let he know if he returned. [REDACTED] sent an email out to the employees of the office, informing them of the incident.

UNCLASSIFIED//FOUOInvestigation on 02/07/2025 at Walnut Creek, California, United States (In Person, Phone)File # 281F-SF-3449614Date drafted 02/10/2025by ZOBACK THUY T

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

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281F-SF-3449614

Continuation of FD-302 of (U//FOUO) Interview with employees of MPA , On 02/07/2025 , Page 2 of 2

██████ still had the email that ██████ sent, with the subject line "Fw: Injured Worker On-site Today 8/25/23 - Morteza Amiri, City of Antioch".
██████ agreed to forward agents the email.

Attached in a 1a are notes and the email from ██████

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